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but upon the fact that it was a "business affected with a public interest," which, being interpreted, seems to mean nothing more than that the welfare of society required the regulation of the business in question, or at best that that was a reasonable view to take and therefore the regulation was not unconstitutional.

In view of the fact that they cite *Munn v. Illinois* as supporting the virtual monopoly test, and also in view of the fact that the authors were obviously not unaware of the North Dakota case (see Beale and Wyman's *Cases on Public Service Companies*), the suppression of all reference to the latter case (which says that the decision in *Munn v. Illinois* is not to be understood as laying down the virtual monopoly test), seems to indicate that they are occupied at this point in supporting a theory rather than in stating the law as it is. Be this as it may, the reader who is not a lawyer should be put on his guard against accepting as settled this proposition of the authors. It may be that ultimately it will become the law—though the present writer sincerely hopes not; it may be that some or many State courts would act upon it today; but to assert that the line has been drawn at this point is to ignore both the decision referred to and—what seems greater in importance—the whole trend of the decisions and opinions of the United States Supreme Court and some of our State courts.

WALTER WHEELER COOK.

Our State Constitutions. By J. Q. DEALEY. (Philadelphia: American Academy of Political and Social Science. 1907. Pp. 98.)

This study, by Prof. James Quayle Dealey of Brown University, is a valuable monograph which is published as a supplement to the *Annals of the American Academy of Political and Social Science* for March, 1907. It is a comparison of constitutions as they stood at the close of the year 1905, and it is intended as a guide to the study of the fundamental law of the States, a purpose which it is well calculated to serve. Its 98 pages give a digest of the contents of State constitutions arranged by topics, so that the various provisions made by different States on the same subjects are contrasted, and reference is facilitated by a full index. It is a thoroughly good piece of work which is so serviceable as to lay all students of American institutions under obligations to Professor Dealey for performing what must have been a laborious task. Indeed, the work is so useful as a convenient manual that another edition to complete it by including the constitution of Oklahoma is desirable.

HENRY JONES FORD.